

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THE BOARD OF EDUCATION OF THE
APPOQUINIMINK SCHOOL DISTRICT,
and THE DELAWARE DEPARTMENT OF
EDUCATION,

Plaintiffs,

v.

JULIE JOHNSON and SAMUEL QUINTON
JOHNSON, IV, parents of SAMUEL
QUINTON JOHNSON, V,

Defendants.

C.A. No. - 0 6 - 7 7 0

MOTION FOR LEAVE TO FILE UNDER SEAL


Plaintiffs, the Board of Education of the Appoquinimink School District,
and the Delaware Department of Education, hereby move to place the Complaint under
seal. The grounds for this Motion are as follows:

1. The primary subject matter of the lawsuit concerns a dispute
regarding the education of a minor child, Samuel Quinton Johnson, V.
2. The Complaint contains highly confidential personal and school
information regarding the minor child.
3. Some or all of the school information may be protected from
disclosure under the Family Educational Rights and Privacy Act ("FERPA"), 20 U.S.C.A.
§1232g.

FILED
JERU S. DISTRICT COURT
DISTRICT OF DELAWARE
2006 DEC 18 PM 4:37

WHEREFORE, Plaintiffs respectfully request that the Complaint in this matter be filed under seal.

YOUNG CONAWAY STARGATT
& TAYLOR LLP



Scott Holt, Esquire (Bar ID 3399)
Michael Stafford, Esquire (Bar ID 4461)
The Brandywine Building, 17th Floor
1000 West Street
Wilmington, DE 19899
Phone: (302) 571-6623, 6553
sholt@ycst.com; mstafford@ycst.com

DEPARTMENT OF JUSTICE

/s/Jennifer L. Kline

Jennifer L. Kline, Esquire (Bar ID 4075)
102 West Water Street
Dover, DE 19901
Phone: (302) 739-7641
Jennifer.Kline@state.de.us

DATED: December 18, 2006